

EXHIBIT C

From: Layne Hilton <l.hilton@kanner-law.com>
Sent: Tuesday, October 8, 2019 6:59 PM
To: Goldberg, Seth A.; Priselac, Jessica
Cc: Conlee Whiteley; Adam Slater; Honik, Ruben; Daniel Nigh; Stanoch, David; Christopher Geddis; Behram V. Parekh; George T. Williamson; Marlene Goldenberg (mjgoldenberglaw.com); Priselac, Jessica; CohenL@gtlaw.com; harkinss@gtlaw.com; cct@pietragallo.com; Jason M. Reefer; Jessica Heinz; 'Blanton, Robert E.'; JPoletto@hkmpp.com; alexia.brancato@kirkland.com; lockardv@gtlaw.com; rubensteinb@gtlaw.com; Klein, Alan; Schwartz, Barbara; Waleko, Alexandra; Rapone, Donna M.
Subject: In re Valsartan -- ZHP Custodians
Attachments: 2019.10.08 Additional Custodians (ZHP).pdf

Seth:

I write further to the parties' meet and confer on October 7, 2019.

At your request, I am providing you with the preliminary list of employees at ZHP, Princeton, Solco and Huahai US who Plaintiffs have identified as being potential custodians, but who were not identified in ZHP's September 23, 2019, custodian list.

To help you in identifying these persons who work for your client(s), I have included what I believe to be their first and last name, the company they work for, and their job title/department, if known. I have also included, at your request, sample and demonstrative bates ranges in ZHP's core discovery production from which Plaintiffs gathered the information regarding these individuals.

Plaintiffs provide this information simply for the purposes of further conferring with ZHP regarding additional sources of custodial documents. Indeed, this list is by no means exhaustive, encompassing or definitive. This list simply represents persons known to Plaintiffs at this moment in time, as a result of an initial review of ZHP's limited core discovery production. Given the limited focus of core discovery, it is without question that this list will grow to include (among many other things): custodians who work for Princeton (which were not included in ZHP's initial list), custodians who work for Solco (which were not included in ZHP's initial list), custodians who work for Huahai US (which were not included in ZHP's initial list), and custodians related to the economic loss claims (which were not included in ZHP's initial list).

As such, Plaintiffs provide the attached information subject to, and without waiving their rights, including their right to supplement any requests as more information becomes known.

Best,

Layne

Layne Hilton
Kanner & Whiteley, L.L.C.
701 Camp Street
New Orleans, LA 70130
(504) 524-5777 voice
(504) 524-5763 fax

www.kanner-law.com

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ZHP Defendants
Additional Custodians Identified by Plaintiffs

Name	Company	Job Title	Bates Number (Examples)
Chaojun, Xie	ZHP	Analyst	PRINSTON00072610-70
Chen, Zhi	Huahai US		PRINSTON00072295
Du, Jun	ZHP/Prinston	CEO – Prinston Pharmaceuticals	PRINSTON00000492-95; PRINSTON0074758-59; PRINSTON0073198; PRINSTON00070460-61; PRINSTON00000533-37; PRINSTON00000232-35; PRINSTON00000565-66
Fei, Xiong	ZHP	Analyst	PRINSTON00072610-70
Gergis, Remonda	Prinston	Quality Assurance	PRINSTON00000492-95; PRINSTON0073192-96; PRINSTON00078983-87; PRINSTON00000232-35
Gu, Eric	Syncores (Huahai Research and Development Center)		PRINSTON0073192-96; PRINSTON00078983-87; PRINSTON00078995-89
Gu, Ziqiang	ZHP and Prinston		PRINSTON0073192-96; PRINSTON00078983-87; PRINSTON00078995-89
Guangping, Hu	ZHP	Director, QC	PRINSTON00072610-70; PRINSTON00071581-46; PRINSTON00078435-47
Guo, Xiaodi	Prinston/Huahai US	Executive Vice President	PRINSTON00000492-95; PRINSTON00019189; PRINSTON00077835; PRINSTON00077823; PRINSTON00072295; PRINSTON00073120; PRINSTON00072212
Rui, Huang	ZHP	Director, QC	PRINSTON00042049-19; PRINSTON00041418-85; PRINSTON00023086-44; PRINSTON00071581-46; PRINSTON00071299-43; PRINSTON00071434-14; PRINSTON00078059-93; PRINSTON00009904-47
Wang, Hai	Solco	President	PRINSTON00000492-95; PRINSTON00000533-37; PRINSTON00000232-35 PRINSTON00000579-83; PRINSTON00000538-41; PRINSTON00000565-66

ZHP Defendants

Additional Custodians Identified by Plaintiffs

Name	Company	Job Title	Bates Number (Examples)
Wang, Lilje	Prinston	VP, Head of Regulatory Affairs	PRINSTON00000492-95; PRINSTON00000533-37; PRINSTON00073192-96; PRINSTON00068560-53 PRINSTON00000521-29
Wang, Minfa	Prinston	VP, Analytical Operations	PRINSTON00000492-95; PRINSTON00000232-35; PRINSTON00000050-53; PRINSTON00068560-53
Youqing, Zheng	ZHP	Deputy Manager, Quality Assurance	PRINSTON00030683-84; PRINSTON00039193-09; PRINSTON00038180-84; PRINSTON00019811-36; PRINSTON00038956-92; PRINSTON00020585-03
Zhang, Quo (Kathy)	Huahai, US	Senior Manager, Regulatory Affairs	PRINSTON00066953-54; PRINSTON00073120; PRINSTON00072212
Zhao, Xiaohong	ZHP	Director, Quality Assurance	PRINSTON0073192-96; PRINSTON00031555-87; PRINSTON00078983-87; PRINSTON00078995-99; PRINSTON0076711-69; PRINSTON0076470-10
Zhu, Lesley	Prinston	Senior Vice President, Business Development	PRINSTON0073198; PRINSTON00079000; PRINSTON00070470-71; PRINSTON0073192-96; PRINSTON00079001-02; PRINSTON00037393-94; PRINSTON00078983-87; PRINSTON00078995-99